

## **EXHIBIT 17**



Deposition of:  
**Simon Hayden**

*October 29, 2020*

In the Matter of:  
**EIG v. Petrobras**

Veritext Legal Solutions  
800-734-5292 | [calendar-dmv@veritext.com](mailto:calendar-dmv@veritext.com) |

Page 303

1 VIDEO TECHNICIAN: The time is 3:45 p.m.  
2 We're back on the record.

3 Please proceed, Counsel.

4 BY MR. WOLINSKY:

5 Q. Mr. Hayden, just a few last questions.

6 The first is, as part of your involvement  
7 in the Sete Brasil investment by EIG, did you  
8 interact at all with Ronnie Hawkins?

9 A. I would have done towards the end of my  
10 involvement.

11 Q. Okay. And what was his role, if any, in  
12 the Sete Brasil investment?

13 A. Well, towards the end of my involvement,  
14 he joined as the head of international. And so  
15 Brazil fell under his sort of domain, internal  
16 domain. And so the Sete investment was -- I  
17 suppose he became sort of the most senior person  
18 overseeing that investment.

19 Q. Okay. And so did you ever have any  
20 direct communications with him about the  
21 investment?

22 A. I don't recall.

Page 304

1 Q. Okay. Did you ever meet Pedro Barusco?

2 A. I don't recall. I only know him through  
3 conversations that -- or maybe it was the  
4 complaint I read -- of who he is. I met people  
5 from Sete and have met board members, and I may  
6 have met him. But I don't recall meeting him.

7 Q. How about Eduardo Musa?

8 A. I don't know who that is.

9 Q. Okay. Have you ever communicated with  
10 any government official or politician in Brazil?

11 A. I mean, the BNDES guys. You know,  
12 government officials, that's all I can think of.

13 Q. Have you ever communicated with anyone  
14 who worked for or on behalf of the Workers Party  
15 in Brazil?

16 A. Not to my knowledge, no.

17 Q. Okay. Have you ever communicated with  
18 anybody who worked for any of the shipyards who  
19 built -- who was contracted to build a ship for  
20 Sete, a drillship for Sete.

21 A. I attended a site visit of the BrasFELS  
22 shipyard when we were showing ADIC. That kind

Page 305

1 of -- it's a diligence trip they made to Brazil.  
2 So I visited a shipyard, the BrasFELS yard. I  
3 think that's the only -- I'm trying to think if  
4 there were other investments. I don't recall  
5 involvement with shipyards apart from the  
6 BrasFELS.

7 Q. Okay. Do you remember who you spoke to  
8 there?

9 A. I don't recall.

10 Q. And when did you first become aware of  
11 Operation Car Wash?

12 A. I don't know. 2015. I'm not sure when I  
13 first learned.

14 Q. Okay. And what is your understanding of  
15 the issues that are covered by Operation Car Wash?

16 MS. LAW: Objection to form.

17 You can answer.

18 BY MR. WOLINSKY:

19 Q. Do you have an understanding of what  
20 issues are covered by Operation Car Wash?

21 MS. LAW: Objection to form.

22 THE WITNESS: I mean, issues -- I mean,

1 it was a corruption scandal where Petrobras  
2 employees and Sete employees were taking bribes, I  
3 think, from -- from shipyards for themselves and  
4 for the political party in Brazil.

5 BY MR. WOLINSKY:

6 Q. Do you know anything else about that?

7 A. No. That's my basic understanding.

8 Q. Okay.

9 MR. WOLINSKY: Okay. I don't have  
10 anything else at this time.

11 MS. LAW: I have no questions for this  
12 witness.

13 MR. WOLINSKY: Great. All right. Take  
14 care, everybody.

15 VIDEO TECHNICIAN: Please stand by.


16 The time is 3:49 p.m., and this concludes  
17 today's testimony given by Mr. Simon Hayden.  
18 We're now off the record.

19 (Whereupon, at 3:49 p.m., the  
20 confidential remote videotaped deposition  
21 of SIMON HAYDEN was concluded.)  
22

Page 307

C E R T I F I C A T E

I do hereby certify that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said witness was taken by me in stenotypy and thereafter reduced to typewriting under my direction; that said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



CHRISTINA S. HOTSKO, RPR, CRR

**ERRATA SHEET***EIG v. Petrobras***Simon Hayden October 29, 2020 Transcript (#4311559)**

<b>Page</b>	<b>Line(s)</b>	<b>Change</b>	<b>Reason</b>
46	12	"meet" should be "met"	Clarification
90	19	"0sitting" should be "sitting"	Transcription error
91	18	"corrects" should be "correct"	Transcription error
151	8	"announcements" should be "assumptions"	Clarification
163	12	"vice-president" should be "vice president"	Transcription error
180	6	"canon" should be "cannon"	Transcription error
184	6	"reai" should be "real"	Transcription error
185	15	"reai" should be "real"	Transcription error
186	21	"Monto" should be "Aldo"	Clarification
202	22	"reai" should be "real"	Transcription error
203	18	"reai" should be "real"	Transcription error
204	14, 22	"reai" should be "real"	Transcription error
205	5	"reai" should be "real"	Transcription error
243	11	"vice-president" should be "vice president"	Transcription error
254	16	"reai" should be "real"	Transcription error
266	13	"reai" should be "real"	Transcription error
267	1	"reai" should be "real"	Transcription error
268	1, 12	"reai" should be "real"	Transcription error

  
Simon Hayden

10-DEC-2020  
Date